

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GILBERT CRUZ

Plaintiff,

V.

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CIVIL ACTION NO. 4:16-CV-3568

DEPUTY ROLANDO DELGADO JR.,
DEPUTY G. PERKINS, DEPUTY T. CUMMINGS,
SERGEANT K BENOIT,
SERGEANT M. STOUFFER, each in their individual
capacity, SHERIFF ED GONZALEZ in his official
capacity, and HARRIS COUNTY.

Defendants.

JURY DEMANDED

DEFENDANT'S PROPOSED EXHIBIT LIST

No.	Description	Offer	Obj.	Admit	Not Admitted
Ex. 1	Underling Incident Report dated May 13, 2016			✓	
Ex. 2	Incident Report dated March 4, 2016				
Ex. 3	Incident Report dated August 9, 2016				
Ex. 4	EMS Report				
Ex. 5	Color photos of Plaintiff x3 ONLY OFFERING 2 PHOTOS			✓	

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GILBERT CRUZPlaintiff,

vs.

DEPUTY ROLANDO DELGADO, JR., et al.,Defendants.§ 4:16-CV-3568

§ CA/CR NO.

§

§ Judge Werlein, Jr.

§ JUDGE

§

§ COURTROOM CLERK

COURT REPORTER

§

§

§

§

§

§ PROCEEDINGGilbert Cruz, Plaintiff

EXHIBIT LIST OF

NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
1	EMS Records from Cy-Fair Volunteer Fire Dept.				
2	Harris County Sheriff's Office Health Services				
2	Medical Records for Gilbert Cruz			WITHDRAWN	
3	2016 05-13 Incident Report				
4	Motion to Dismiss Criminal Charge for Insufficient Evidence				
5	Order Dismissing Criminal Charge				
6					
7					
8					
9					

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Plaintiff reserves the right to utilize any exhibit listed on Defendant's Exhibit List and to use such rebuttal or impeachment exhibits as are necessary, as well as any document later produced by Defendant.

Plaintiff hereby gives notice to all parties that he intends to use all documents exchanged and produced between the parties, including, but not limited to correspondence, pleadings, records and discovery responses during the trial of this matter.

Respectfully submitted,

/s/ Scott H. Palmer

SCOTT H. PALMER
State Bar No. 00797196
JAMES P. ROBERTS
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was forwarded to Defendant's counsel via ECF on August 1, 2019.

/s/ Scott H. Palmer

SCOTT H. PALMER